

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

V.

HINDS COUNTY, ET AL.,

DEFENDANTS.

Case No.: 3:16-cv-00489-CWR-RHWR

**UNITED STATES' RESPONSE IN OPPOSITION TO DEFENDANTS' URGENT AND NECESSITOUS MOTION TO STAY RECEIVER ORDERS PENDING APPEAL**

The United States opposes Defendants' Urgent and Necessitous Motion to Stay Receiver Orders Pending Appeal, ECF No. 227; *see* Orders, ECF Nos. 215, 216. The Court found Defendants in contempt twice and determined that the Defendants have made so little progress in correcting unconstitutional conditions in the Hinds County Jail (Jail) that a receivership is necessary. The Defendants ask the Court to stay relief pending appeal, and argue that their refusal to comply with the Constitution and federal court orders causes no harm to the United States. Meanwhile, conditions in the Jail remain dangerous, with detainees in jeopardy of grave harm, and Jail conditions continue to reflect the Defendants' disregard for this Court's orders. For the reasons given in the Memorandum in Support of this Response, the Court should deny the Defendants' Motion in its entirety.

Respectfully submitted,

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DATED: November 18, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on November 18, 2022, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

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